

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES
AND PRODUCTS LIABILITY
LITIGATION

*This relates to all cases listed on
Exhibit A*

MDL No. 3:16-md-02738

**NOTICE OF MOTION TO
DISMISS PLAINTIFFS'
COMPLAINTS PURSUANT TO
RULE 41(b)**

TO: *All Counsel of Record*

COUNSEL:

PLEASE TAKE NOTICE that Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. ("Defendants"), will move before this Court on October 5, 2020, or as soon thereafter as counsel may be heard, pursuant to Fed. R. Civ. P. 41(b), for an Order dismissing plaintiffs' complaints for failure to comply with this Court's May 15, May 26, and June 4, 2020 Orders.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion to Dismiss, Defendants will rely upon the accompanying Letter Brief in Support.

PLEASE TAKE FURTHER NOTICE that a Proposed Order is attached.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Respectfully submitted,

/s/ Susan M. Sharko

Susan M. Sharko

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Johnson and Johnson & Johnson Consumer
Inc.*

Dated: September 9, 2020

EXHIBIT A

No.	Full Name	Case No.	Firm
1.	Smith, Pauline	3:18-cv-14853	Burns Charest LLP
2.	Stallings, Elizabeth	3:18-cv-00274	Burns Charest LLP
3.	Gray, Martha	3:18-cv-00519	Burns Charest LLP
4.	Stewart, Kathlene	3:19-cv-17655	Burns Charest LLP
5.	Wagoner, Earline	3:18-cv-05820	Burns Charest LLP
6.	Cunningham, Theresa	3:16-cv-07889	Burns Charest LLP // Burns Charest LLP // Meierhenry Sargent, LLP
7.	Cowart, Deniria	3:19-cv-22157	Driscoll Firm, P.C.
8.	Castillo, Lorraine	3:19-cv-00576	Fears Nachawati Law Firm
9.	Richards, Duane	3:18-cv-14654	Fears Nachawati Law Firm
10.	Rodgers, Michelle	3:19-cv-15158	Fears Nachawati Law Firm
11.	Bynam, Denise	3:19-cv-13428	Kiesel Law, LLP // LAW OFFICE OF HAYTHAM FARAJ // Martinian & Associates, Inc.
12.	Hartman, Pamela	3:20-cv-01264	Morgan & Morgan
13.	Conley, Alexis	3:18-cv-11677	Murphy, Falcon & Murphy, P.A.
14.	Baxter, Corrine	3:17-cv-07780	The Dugan Law Firm
15.	Joseph, Shintelle	3:16-cv-07465	The Dugan Law Firm